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Attorneys for Defendant/Counterclaim-Plaintiff
Fieldturf USA, Inc., and Defendant Fieldturf Tarkett
USA Holdings, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

FIELD TURF BUILDERS, LLC, an Oregon
limited liability company; **MARK RYAN**,

CV No.: CV 09 671 HZ

Plaintiffs,

**STIPULATED MOTION TO EXTEND
DEADLINES FOR DISPOSITIVE
MOTION RESPONSES AND REPLIES**

vs.

FIELDTURF USA, INC., a Florida
corporation; **FIELDTURF TARKETT USA
HOLDINGS, INC.**, a foreign corporation;
JOE FIELDS; **MICHAEL MCNEIL**,

Defendants.

FIELDTURF USA, INC., a Florida
Corporation,

Counterclaim-Plaintiff,

vs.

**CRYSTAL RYAN, BOECKMAN
PROPERTIES, LLC**, an Oregon limited
liability company, and **GULF PACIFIC
CO.**, an Oregon corporation,

Additional Counterclaim-Defendants.

The parties jointly move the Court for an extension of time pursuant to this Stipulated Motion to Extend Dispositive Motion Response and Reply Deadlines.

The parties request that the deadlines for responses and replies to the pending cross motions for summary judgment be extended as described below:

Event	Current Deadline	Proposed Deadline
Responses to dispositive motions	July 15, 2011	July 22, 2011
Replies to dispositive motions	July 29, 2011	August 5, 2011

The parties propose that the remaining dates remain as currently scheduled:

Event	Current Deadline
Tentative date for oral argument on dispositive motions	August 15, 2011
Expert disclosures	Within 30 days of ruling on dispositive motions
Rebuttals to expert disclosures	30 days after expert disclosures
Close of expert discovery	Within 30 days after rebuttals
Pretrial order	14 days before commencement of trial

DATED this 7th day of July, 2011.

MARKOWITZ, HERBOLD, GLADE
& MEHLHAF, P.C.

GREENE & MARKLEY, P.C.

By: /s/ Stacy R. Owen
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Of Attorneys for
Defendant/Counterclaim-Plaintiff
Fieldturf USA, Inc., and Defendant
Fieldturf Tarkett USA Holdings, Inc.

By: /s/ Sean C. Currie
S. Ward Greene, OSB #77413
Charles R. Markley, OSB #75240
Sean C. Currie, OSB #082971
(503)295-2668
Of Attorneys for Plaintiffs/Counterclaim-
Defendants Field Turf Builders, LLC and
Mark Ryan and additional Counterclaim-
Defendants Crystal Ryan, Boeckman
Properties, LLC and Gulf Pacific

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ATTORNEY CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2011, I have made service of the foregoing
**STIPULATED MOTION TO EXTEND DEADLINES FOR DISPOSITIVE MOTION
RESPONSES AND REPLIES** on the party/ies listed below in the manner indicated:

S. Ward Greene
Charles R. Markley
Sean Currie
Greene & Markley, P.C.
1515 SW Fifth Avenue, Suite 600
Portland, OR 97201

- U.S. Mail
- Facsimile
- Hand Delivery
- Overnight Courier
- Email
- Electronically via USDC CM/ECF system

Bonnie M. Richardson
Folawn Alterman & Richardson LLP
805 SW Broadway, Suite 2750
Portland, OR 97205

DATED this 7th day of July, 2011.

/s/ Stacy R. Owen

Stacy R. Owen, OSB #074826
Defendant/Counterclaim-Plaintiff Fieldturf USA
Inc., and Defendant Fieldturf Tarkett USA
Holdings, Inc.

CERTIFICATE OF SERVICE